

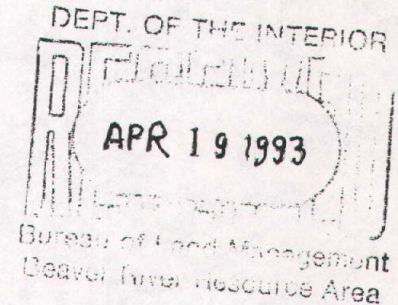
GENEVA STEEL

P.O. BOX 2500
PROVO, UTAH 84603

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April 14, 1993

Attention: Gina Pack
Resource Area Geologist
Beaver River Resource Area
Cedar City District
Bureau of Land Management
Department of the Interior
365 S. Main
Cedar City, UT 84720



Dear Gina:

Enclosed for your review is a Plan of Operation re-submission for the portion of our Comstock/Mt. Lion Iron Mine which lies upon unpatented mining claims on federal lands. A portion of the Plan includes areas that were disturbed prior to FLPMA and prior to Geneva commencing operations on the project. Also included are areas projected for use over the life of the mine. Please replace the April 9, 1993 Plan of Operation submission with this re-submission, except for the published article which was sent to you.

A site visit can be scheduled by contacting Jerry Grover at 227-9461. If you have any additional questions relating to the Plan, Jerry can also answer those questions.

Sincerely,

J. R. Starley, P.E.
Chief Engineer--Environment

JRS:mh
Enclosure

cc: Max Sorenson w/o enclosures
Roy Benson w/enclosures
Jerry Grover w/enclosures

43 CFR 3809--Plan of Operation
Comstock/Mt. Lion Iron Mine

Operator/Claimant: Geneva Steel (previously BM&T, Inc.) (43 CFR 3809.1-5(c)(1))

Box 20-B
Santaquin, UT
84655

Contact Person: Jerry Grover, Environmental Engineer
Geneva Steel

P. O. Box 2500
Provo, UT
84603

Project Description (43 CFR 3809.1-5(c)(2); 43 CFR 3809.1-5(c)(4);
43 CFR 3809.1-3(d)(1)):

Geneva Steel owns and operates the Comstock/Mt. Lion Iron Mine under contract to Gilbert Development Company. Geneva Steel took over operations of the iron mine from CF&I, BHP-Utah International, and U.S. Steel in 1987. 99% of the operation is carried out on private lands, and it is only a small portion of the operation that is or will be carried out on unpatented mining claims on BLM administered lands located in Township 36 South, Range 13 West, Sections 18 & 19, SLM.

Areas of surface disturbance on federal lands are outlined on Map IM-0100-3-A. This map is a base map from the Iron Mountain Mines Reclamation Permit (M/021/008) filed with the Division of Oil, Gas and Mining, Department of Natural Resources, State of Utah.

One of the areas covered by this Plan involves operations commenced on an area of pre-FLPMA disturbance. The area consists of part of an old waste dump which will have additional overburden materials placed on top of it. Approximate surface area of the project is identified on the attached maps.

The project involving federal lands will principally involve addition to and/or extensions of existing waste dumps. All access will occur on existing access roads located on private property, except for one small portion of an access road. The life of the mining on the project is expected to extend for 25+ years. The total maximum extent of surface disturbance is 41.61 acres.

No toxic or deleterious materials or wastes are present at the site. The potential for acidic runoff from overburden material is very low, based on the chemicals present in ore

and rock materials, plus results of sampling conducted in 1991 for acid generating potential.

Landslides would not be present in the area as the federal lands will only be used for overburden dumps. The entire mine is currently subject to a NPDES stormwater runoff permit which prescribes erosion control measures and surface water runoff quality controls. For the area of the project subject to disturbance, no specific erosion control measures were warranted, as no drainages are involved.

Threatened or endangered species or critical habitats have not been identified at the site. (Bureau of Land Management, Department of the Interior, 1984, "Resource Management Impact Statement for the Cedar/Beaver/Garfield/Antimony Planning Area, Cedar City District, Utah). In addition, the Division of Wildlife Resources has determined that there is no significant effect by ongoing mining operations on deer that may winter in the mine area (Personal Communication, Floyd H. Coles, 1977).

Current Mt. Lion Waste Dump Area (Prior Disturbed Area) Summary:

Reclamation practices will be the same as for the Future Mt. Lion Waste Dump except that topsoil cover will range from 4-6 inches and the vegetative cover will consist principally of wheatgrasses and yellow clover. A variance to the cover requirements has also been granted as this area contained no topsoil or vegetative resources when Geneva commenced operations.

Also attached for your information is a recently published article describing the background, geology, groundwater and other features of the mine area which may be of use to you.